

FILED

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2012 SEP 24 PM 4: 27

M.L. HATCHER, CLK
U.S. BANKRUPTCY COURT
W.D. OF WA AT SEATTLE
BY _____ DEP CLK.

Judge: Hon. Marc L Barrera
Chapter: Chapter 7

Hearing Date: September 7, 2012

Hearing Time: 9:30 a.m.

Reconsideration Hearing: Not Finalized

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

CASE NO. 10-19817

ADAM R. GROSSMAN

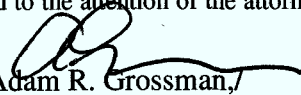
RESPONSE TO DOCKET NO. 405

1. Docket No. 405 is a deficient filing. It is also deficient procedurally. The enumeration of Docket No. 405's deficiencies are well organized by the structure of Rule 9011.¹
2. The novel solution to seek repayment from attorney malpractice insurance rather than Fund assets contains much appeal to other investors, but this is premature since Rule 9011 requires notification and a chance for the offending entry to be stricken. I have alerted the party's attorney and I fully expect the submission to be stricken in its entirety.
3. To the extent that Docket No. 405 was solicited or submitted by an attorney and not *pro se*, I intend to ask for substantial 9011 sanctions from the attorney who solicited or submitted the document without requisite identification of representation. Violations of 9011 are multiple, expensive, plentiful, and obvious to a lawyer exercising due diligence.

Signed on the 24th of September, 2012 in Seattle, WA.
s/Adam R. Grossman/ 

¹ Rule 9011(a) begins, "Every petition, pleading, written motion, and other paper... shall be signed by at least one attorney of record in the attorney's individual name. A party who is not represented by an attorney shall sign all papers. Each paper shall state the signer's address and telephone number, if any. An unsigned paper shall be stricken unless omission of the signature is corrected promptly after being called to the attention of the attorney or party" and continues with the enumeration of other violations.

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